## **REMARKS/ARGUMENTS**

The Office Action mailed April 18, 2006 has been reviewed and carefully considered. Claims 12-17, and 19-22 are pending in this application, with claim 12 being the only independent claim. The specification has been amended to correct a reference to a previous application. Reconsideration of the above-identified application, as herein amended and in view of the following remarks, is respectfully requested.

## **Claim Amendments**

Independent claim 12 is amended to incorporate the limitation of dependent claim 18 and to further recite that the interfaces comprise quick-action couplings. Support for these amendments is found on page 3, lines 12-17. Claim 18 is canceled without prejudice.

Dependent claim 14 is amended to correct a minor informality so that all terms have proper antecedent basis.

## **Objection to Claims**

Claim 14 stands objected to as lacking proper antecedent basis for "dampening rolls". Dependent claim 14 is amended in accordance with the Examiner's suggestion. The term "dampening" is changed to --damping-- which has proper antecedent basis in independent claim 12. In view of the above amendments and remarks, the objection to claim 14 should be withdrawn

## Rejection of Claims Over Prior Art

Claims 12-15, 17-19, 21, and 22 stand rejected under 35 U.S.C. §103 as unpatentable over U.S. Patent No. 4,889,051 (Sarda) in view of U.S. Patent No. 6,435,086 (Rendelmann).

Claims 16 and 20 stand rejected under 35 U.S.C. §103 as unpatentable over Sarda and Rendelmann and further in view of U.S. Patent No. 5,794,531 (Keller).

Independent claim 12 now recites "inking unit being removably receivable in the printing unit and comprising side walls, a plurality of rolls arranged between said side walls, and a dedicated drive mounted on at least one of said side walls of said inking unit for driving said plurality of rolls, and interfaces for at least one of pressure medium supply, ink supply, dampening solution supply, and temperature control connections, said interfaces comprising quick-action couplings".

Sarda discloses a detachable inking module 16 for an offset printing press. The detachable inking module 16 has a plate cylinder 17 which receives damping fluid from a damping fluid reservoir 19 and receives ink from a duct 25 (col. 4, lines 55-63 of Sarda). The printing machine also includes a permanently connected inking unit 2A and damping unit 2B (see Fig. 3; and col. 1, lines 45-50). The detachable inking unit 16 is selectably connected to print a second color (col. 4, lines 25-37). The detachable inking module 16 is also connected to the printing unit by pneumatic struts 29 and arms 30.

Rendleman discloses a retractable inking unit which is movable from an operating position to a retracted position. Rendleman discloses that the inking unit has a reservoir 70.

As stated in MPEP §2143, to establish a *prima facie* case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine the reference teachings. Second there must be a reasonable expectation of success. Finally, the prior art reference (or references when combines) must teach or suggest all the claim limitations. The teaching or suggestion to make the claimed

combination and the reasonable expectation of success must both be found in the prior art, not in applicant's disclosure. *In re Vaeck*, 947 F.2d 488, 20 USPQ2d 1438 (Fed. Cir. 1991).

The combined teachings of Sarda and Rendleman fail to teach or suggest "interfaces for at least one of pressure medium supply, ink supply, dampening solution supply, and temperature control connections, said interfaces comprising quick-action couplings". In contrast, Sarda and Rendleman both disclose that the inking units include reservoirs with the necessary ink and dampening fluids. There is no teaching or suggestion for providing quick-action coupling for pressure medium supply, ink supply, dampening solution supply, and temperature control connections, as recited in independent claim 12.

The Examiner alleges that Sarda inherently teaches interfaces for ink and dampening solution supply. However, Sarda specifically discloses that the detachable inking device is independent and includes all the components necessary for effecting moistening and inking (see abstract). Since Sarda discloses an independent inking device, Sarda fails to inherently teach or suggest "interfaces for at least one of pressure medium supply, ink supply, dampening solution supply, and temperature control connections, said interfaces comprising quick-action couplings". In view of the above, independent claim 12 is deemed to be allowable over Sarda in view of Rendleman.

Dependent claims 13-17, and 19-22, each being dependent on independent claim 12, are allowable for at least the same reasons as is independent claim 12, as well as for the additional recitations contained therein.

The application is now deemed to be in condition for allowance and notice to that effect is solicited.

It is believed that no fees or charges are required at this time in connection with the present application. However, if any fees or charges are required at this time, they may be charged to our Patent and Trademark Office Deposit Account No. 03-2412.

> Respectfully submitted, COHEN, PONTANI, LIEBERMAN & PAVANE LLP

Reg. No. 38,887 551 Fifth Avenue, Suite 1210 New York, New York 10176

(212) 687-2770

Dated: September 18, 2006